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June 26, 2019

**VIA E-MAIL  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*  
Case No. 09-50026 (MG)**

Dear Judge Glenn:

Counsel for New GM write to update the Court on New GM's efforts to voluntarily mediate and attempt to resolve pre-sale personal injury and wrongful death claims (the "Pre-Sale PIWD Claims"). See February 2, 2019 Letter [ECF No. 14411], December 12, 2018 Letter [ECF No. 14384]; July 30, 2018 Letter [ECF No. 14377]; June 11, 2018 Letter [ECF No. 14328]; and February 28, 2019 Letter [ECF No 14444].

Yesterday, New GM executed a confidential term sheet memorializing an agreement with claimants represented by the Potts Law Firm, Junell & Associates, PLLC, and the Burnett Law Firm to settle a sixth docket involving a total of 98 Pre-Sale PIWD claims, of which (i) 82 are filed both as late claims in this Court and as claims in the MDL Court and (ii) 16 are pending only as late claims in this Court. (These 98 claimants are represented in this Court by the Andrews Meyers firm.) All 98 claimants eligible for this aggregate settlement are included on Schedule 2 to the settlement agreement proposed by the GUC Trust and various claimants on February 1, 2019 (the "Proposed Settlement").

In sum, since November 2018, New GM has entered into agreements in principle involving a total of 600 Pre-Sale PIWD claims, of which (i) 392 are filed both as late claims in this Court and as claims in the MDL Court, (ii) 149 are pending only as late claims in this Court, (iii) 40 are pending only in the MDL Court, (iv) 16 are unfiled, and (v) 3 are in state courts (two in state court

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only and one in both state court and as a late claim in this Court). Of these 600 claimants eligible for various aggregate settlements, 356 are also currently included on Schedule 2 to the Proposed Settlement.

Each of these agreements concerns a confidential, private aggregate settlement that includes prerequisites to be met and, upon occurrence of those prerequisites, such claimants will withdraw their late claims in this Court and dismiss with prejudice their Pre-Sale PIWD Claims in the MDL Court or other forums as applicable.

Respectfully submitted,

/s/ Paul M. Basta

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